

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:)	
)	
THE FINANCIAL OVERSIGHT AND)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO)	Title III
)	
as representative of)	Case No. 17-BK-03283 (LTS)
)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,)	
)	
Debtors. ¹)	
In re:)	
)	PROMESA
THE FINANCIAL OVERSIGHT AND)	Title III
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	Case No. 17-BK-03566 (LTS)
as representative of)	
)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE)	
GOVERNMENT OF THE COMMONWEALTH OF)	
PUERTO RICO,)	
)	
Debtor.)	
ALTAIR GLOBAL CREDIT OPPORTUNITIES FUND)	Adv. Proc. No. 17-00219 (LTS)
(A), LLC, <i>et al.</i>)	Adv. Proc. No. 17-00220 (LTS)
)	
v.)	

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE COMMONWEALTH OF PUERTO RICO, *et al.*

THE SPECIAL CLAIMS COMMITTEE OF THE
FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, ACTING BY AND
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF ALL TITLE III DEBTORS
(OTHER THAN COFINA),

as co-trustees of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,

Plaintiff,

V.

DEFENDANT 1M, *et al.*,

Defendants.

THE SPECIAL CLAIMS COMMITTEE OF THE
FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, ACTING BY AND
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF ALL TITLE III DEBTORS
(OTHER THAN COFINA),

as co-trustees of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,

Adv. Proc. No. 19-00356 (LTS)

Adv. Proc. No. 19-00357 (LTS)

Plaintiff,

V.

STOEGER GLASS & CO., *et al.*,

Defendant.

THE SPECIAL CLAIMS COMMITTEE OF THE
FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, ACTING BY AND
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF ALL TITLE III DEBTORS
(OTHER THAN COFINA),

as co-trustees of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,

Plaintiff,

V.

DEFENDANT 1H-78H,

Defendants.

THE SPECIAL CLAIMS COMMITTEE OF THE
FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, ACTING BY AND
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF ALL TITLE III DEBTORS

Adv. Proc. No. 19-00359 (LTS)

Adv. Proc. No. 19-00361 (LTS)

(OTHER THAN COFINA),
as co-trustees of
THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,
Plaintiff,
v.
DEFENDANT 1G-50G, *et al.*,
Defendants.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO,
and
THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF ALL TITLE III DEBTORS (OTHER
THAN COFINA),
as section 926 trustee of
THE COMMONWEALTH OF PUERTO RICO
Plaintiffs,²
against

ANDALUSIAN GLOBAL DESIGNATED ACTIVITY
COMPANY; THE BANK OF NEW YORK MELLON;
MASON CAPITAL MASTER FUND LP; OCHER
ROSE, L.L.C.; SV CREDIT, L.P.; CROWN MANAGED)

Adv. Proc. No. 19-00366 (LTS)

² The Official Committee of Unsecured Creditors serves as section 926 trustee and co-plaintiff in the prosecution of this adversary proceeding pursuant to Docket No. 6990, which is incorporated herein by reference.

ACCOUNTS FOR AND ON BEHALF OF CROWN/PW)
SP; LMA SPC FOR AND ON BEHALF OF MAP 98)
SEGREGATED PORTFOLIO; OCEANA MASTER)
FUND LTD.; PENTWATER MERGER ARBITRAGE)
MASTER FUND LTD.; AND PWCM MASTER FUND)
LTD,)

Defendants.)

THE FINANCIAL OVERSIGHT AND)
MANAGEMENT BOARD FOR PUERTO RICO,)

as representative of)

EMPLOYEES RETIREMENT SYSTEM OF THE)
GOVERNMENT OF THE COMMONWEALTH OF)
PUERTO RICO,)

and)

THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS (OTHER)
THAN COFINA),)

as section 926 trustee of)

THE COMMONWEALTH OF PUERTO RICO)

Plaintiffs,³)

against)

GLENDON OPPORTUNITIES FUND, L.P.;)
OAKTREE-FORREST MULTI-STRATEGY, LLC)
(SERIES B); OAKTREE OPPORTUNITIES FUND IX,)
L.P.; OAKTREE OPPORTUNITIES FUND IX)
(PARALLEL 2), L.P.; OAKTREE VALUE)
OPPORTUNITIES FUND, L.P.; PUERTO RICO AAA)
PORTFOLIO BOND FUND, INC.; PUERTO RICO)
AAA PORTFOLIO BOND FUND II, INC.; PUERTO)
RICO AAA PORTFOLIO TARGET MATURITY)
FUND, INC.; PUERTO RICO FIXED INCOME FUND,)
INC.; PUERTO RICO FIXED INCOME FUND II, INC.;)

Adv. Proc. No. 19-00367 (LTS)

³ The Official Committee of Unsecured Creditors serves as section 926 trustee and co-plaintiff in the prosecution of this adversary proceeding pursuant to Docket No. 6990, which is incorporated herein by reference.

PUERTO RICO FIXED INCOME FUND III, INC.;)
 PUERTO RICO FIXED INCOME FUND IV, INC.;)
 PUERTO RICO FIXED INCOME FUND V, INC.;)
 PUERTO RICO GNMA & U.S. GOVERNMENT)
 TARGET MATURITY FUND, INC.; PUERTO RICO)
 INVESTORS BOND FUND I; PUERTO RICO)
 INVESTORS TAX-FREE FUND, INC.; PUERTO RICO)
 INVESTORS TAX-FREE FUND II, INC.; PUERTO)
 RICO INVESTORS TAX-FREE FUND III, INC.;)
 PUERTO RICO INVESTORS TAX-FREE FUND IV,)
 INC.; PUERTO RICO INVESTORS TAX-FREE FUND)
 V, INC.; PUERTO RICO INVESTORS TAX-FREE)
 FUND VI, INC.; PUERTO RICO MORTGAGE-)
 BACKED & U.S. GOVERNMENT SECURITIES)
 FUND, INC.; TAX-FREE PUERTO RICO FUND, INC.;)
 TAX-FREE PUERTO RICO FUND II, INC.; TAX-)
 FREE PUERTO RICO TARGET MATURITY FUND,)
 INC.; UBS IRA SELECT GROWTH & INCOME)
 PUERTO RICO FUND,)

Defendants.)

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**SUPPLEMENT TO URGENT JOINT MOTION TO STAY CERTAIN CONTESTED
 MATTERS AND ADVERSARY PROCEEDINGS RELATED TO THE BONDS ISSUED
 BY THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”) as the sole representative of Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), pursuant to Section 315(b) of PROMESA, the Special Claims Committee of the Financial Oversight and Management Board for Puerto Rico (the “SCC”), the Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “Retiree Committee”), certain groups of ERS bondholders represented by Jones Day and White & Case

LLP (the “ERS Bondholder Groups”),⁴ and The Bank of New York Mellon, as Fiscal Agent for the ERS bonds (the “Fiscal Agent” and, together with the ERS Bondholder Groups, the Oversight Board, the SCC and the Retiree Committee, the “Parties”), respectfully submit this supplement to their urgent joint motion to stay certain actions in their entirety and certain motions pending in the above-captioned proceedings.

BACKGROUND

1. On April 5, 2021, the Parties filed the *Urgent Joint Motion to Stay Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [Case No. 17-bk-3283, ECF No. 16321] (the “Stay Motion”).

2. On April 6, 2021, the Court issued the *Order Adjourning April 8, 2021, Oral Argument and Scheduling Briefing of Urgent Joint Motion to Stay Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [Case No. 17-bk-3283, ECF No. 16323] (the “Order to Supplement Stay Motion”), directing the Parties to file a supplement to the Stay Motion, including a revised proposed order, enumerating the docket entry numbers in every

⁴ Altair Global Credit Opportunities Fund (A), LLC, Andalusian Global Designated Activity Company, Crown Managed Accounts for and on behalf of Crown/PW SP, Glendon Opportunities Fund, L.P., LMA SPC for and on behalf of Map 98 Segregated Portfolio, Mason Capital Master Fund LP, Oaktree-Forrest Multi-Strategy, LLC (Series B), Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel), L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Oaktree Huntington Investment Fund II, L.P., Oaktree Opportunities Fund X, L.P., Oaktree Opportunities Fund X (Parallel), L.P., Oaktree Opportunities Fund X (Parallel 2), L.P., Oaktree Value Opportunities Fund Holdings, L.P., Oceana Master Fund Ltd., Ocher Rose, L.L.C., Pentwater Merger Arbitrage Master Fund Ltd., Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico Fixed Income Fund VI, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Investors Bond Fund I, Puerto Rico Investors Tax-Free Fund, Inc., Puerto Rico Investors Tax-Free Fund II, Inc., Puerto Rico Investors Tax-Free Fund III, Inc., Puerto Rico Investors Tax-Free Fund IV, Inc., Puerto Rico Investors Tax-Free Fund V, Inc., Puerto Rico Investors Tax-Free Fund VI, Inc., Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc., PWCM Master Fund Ltd., Redwood Master Fund, Ltd, SV Credit, L.P., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., Tax-Free Puerto Rico Target Maturity Fund, Inc., and UBS IRA Select Growth & Income Puerto Rico Fund.

relevant case and adversary proceeding of each contested matter and motion that would be subject to the stay sought in the Stay Motion, and setting a briefing schedule on the Stay Motion.

RELIEF REQUESTED

3. Pursuant to the Stay Motion and the Order to Supplement Stay Motion, the Parties request the following adversary proceedings be stayed in their entirety, including, where applicable, the pending motions for summary judgment:

- a. Case No. 17-ap-219-LTS
- b. Case No. 17-ap-220-LTS
- c. Case No. 19-ap-356-LTS, including ECF Nos. 115 and 120
- d. Case No. 19-ap-357-LTS, including ECF Nos. 120 and 125
- e. Case No. 19-ap-359-LTS, including ECF Nos. 99 and 104
- f. Case No. 19-ap-361-LTS, including ECF Nos. 102 and 107
- g. Case No. 19-ap-366-LTS, including ECF Nos. 91, 94 and 95
- h. Case No. 19-ap-367-LTS, including ECF Nos. 107, 110 and 111

4. Pursuant to the Stay Motion and the Order to Supplement Stay Motion, the Parties also request the following docket entries in the Commonwealth and/or ERS Title III cases be stayed:

a. *Omnibus Objection of Official Committee of Unsecured Creditors to Claims Asserted by Holders of Bonds Issued by Employees Retirement System of Government of Puerto Rico* [Case No. 17-3283, ECF No. 5580; Case No. 17-bk-3566, ECF No. 381]

b. *Objection of Official Committee of Unsecured Creditors to Claims Asserted by Oaktree Funds that Hold Bonds Issued by Employees Retirement*

System of Government of Puerto Rico [Case No. 17-3283, ECF No. 5586; Case No. 17-bk-3566, ECF No. 384]

c. *Omnibus Objection of the Official Committee of Retired Employees of the Commonwealth of Puerto Rico, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007 to Claims Filed or Asserted by Holders of ERS Bonds* [Case No. 17-3283, ECF No. 6482; Case No. 17-bk-3566, ECF No. 469]

d. *Objection of Financial Oversight and Management Board, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted Against the Commonwealth by The Bank of New York Mellon, as Fiscal Agent* [Case No. 17-3283, ECF No. 7075]

e. *Supplemental Objection of Financial Oversight and Management Board, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted Against the Commonwealth by The Bank of New York Mellon, as Fiscal Agent* [Case No. 17-3283, ECF No. 9700]

f. *Objection of Financial Oversight and Management Board, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted Against ERS by The Bank of New York Mellon, as Fiscal Agent* [Case No. 17-3283, ECF No. 9701; Case No. 17-bk-3566, ECF No. 757]

g. *Debtor's Omnibus Objection to Claims – One Hundred and Fifty-First Omnibus Objection of Financial Oversight and Management Board, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted Against the Commonwealth by the Andalusian Claimants* [Case No. 17-3283, ECF No. 9702]

h. *Debtor's Omnibus Objection to Claims – One Hundred and Fifty-Second Omnibus Objection of Financial Oversight and Management Board, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted Against ERS by the Andalusian Claimants* [Case No. 17-3283, ECF No. 9703; Case No. 17-bk-3566, ECF No. 758]

i. *Debtor's Omnibus Objection to Claims – One Hundred and Fifty-Third Omnibus Objection of Financial Oversight and Management Board, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted Against the Commonwealth by the Puerto Rico Funds Claimants* [Case No. 17-3283, ECF No. 9704]

j. *Debtor's Omnibus Objection to Claims – One Hundred and Fifty-Fourth Omnibus Objection of Financial Oversight and Management Board, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted Against ERS by the Puerto Rico Funds Claimants* [Case No. 17-3283, ECF No. 9705; Case No. 17-bk-3566, ECF No. 759]

k. *Additional Omnibus Objection of the Official Committee of Unsecured Creditors to Claims Asserted by Holders of Bonds Issued by Employees Retirement System of Government of Puerto Rico* [Case No. 17-3283, ECF No. 9708; Case No. 17-bk-3566, ECF No. 760]

l. *Additional Objection of the Official Committee of Unsecured Creditors to Claims Asserted by Oaktree Funds that Hold Bonds Issued by Employees Retirement System of Government of Puerto Rico* [Case No. 17-3283, ECF No. 9709; Case No. 17-bk-3566, ECF No. 761]

m. *ERS Bondholders' Motion and Request for Allowance and Payment of Post-Petition and Administrative Expense Claims* [Case No. 17-3283, ECF No. 9285; Case No. 17-bk-3566, ECF No. 707; and Case No. 17-bk-3283, ECF No. 9294; Case No. 17-bk-3566, ECF No. 710]

n. *Motion for Joinder of The Bank of New York Mellon, as Fiscal Agent, in ERS Bondholders' Motions for Allowance and Payment of Post-Petition and Administrative Expense Claims* [Case No. 17-bk-3283, ECF No. 9298; Case No. 17-bk-3566, ECF No. 712]

o. *ERS Bondholders' Supplement to Proofs of Claim and Motions for Allowance of Administrative Expense Claims* [Case No. 17-bk-3283, ECF No. 12536; Case No. 17-bk-3566, ECF No. 848]

p. *Motion of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Disallow and Dismiss Claims Asserted or Filed by ERS Bondholders and the ERS Fiscal Agent Pursuant to Bankruptcy Rules 3007(b) & 7012(b)* [Case No. 17-3283, ECF No. 13054; Case No. 17-bk-3566, ECF No. 891]

q. *Motion to Dismiss Proofs of Claims and Administrative Expense Claims Asserted Against the Commonwealth and ERS by Certain Holders of ERS Bonds and the Fiscal Agent* [Case No. 17-3283, ECF No. 13056; Case No. 17-bk-3566, ECF No. 892]

r. *Claimants' Motion for Judgment on the Pleadings Pursuant to Fed. R. Civ. P. 12(c)* [Case No. 17-bk-3283, ECF No. 13400; Case No. 17-bk-3566, ECF No. 917]

s. *ERS Bondholders Motion for Partial Summary Judgment on Ultra Vires Issues and Proceedings* [Case No. 17-bk-3283, ECF No. 14241; Case No. 17-bk-3566, ECF No. 971]

t. *Committees' Motion for Summary Judgment on Ultra Vires Issues* [Case No. 17-bk-3283, ECF No. 14246; Case No. 17-bk-3566, ECF No. 978]

u. *Motion of The Bank of New York Mellon, as Fiscal Agent, for Summary Judgment Pursuant to Fed. R. Civ. P. 56 Regarding Ultra Vires Challenge* [Case No. 17-bk-3283, ECF No. 14247; Case No. 17-bk-3566, ECF No. 976]

Dated: April 7, 2021
New York, NY

Respectfully submitted,

/s/ Alfredo Fernández-Martínez

Alfredo Fernández-Martínez
DELGADO & FERNÁNDEZ, LLC
PO Box 11750
Fernández Juncos Station
San Juan, Puerto Rico 00910-1750
Tel. (787) 274-1414
Fax: (787) 764-8241
afernandez@delgadofernandez.com
USDC-PR 210511

/s/ Bruce Bennett

Bruce Bennett (*pro hac vice*)
JONES DAY
555 South Flower Street Fiftieth Floor
Los Angeles, California 90071
Tel. (213) 489-3939
Fax: (213) 243-2539
bbennett@jonesday.com

Benjamin Rosenblum (*pro hac vice*)
JONES DAY
250 Vesey Street
New York, New York 10281
Tel. (212) 326-3939
Fax: (212) 755-7306
brosenblum@jonesday.com

Matthew Papez (*pro hac vice*)
Beth Heifetz (*pro hac vice*)
JONES DAY
51 Louisiana Ave. N.W.
Washington, DC 20001
Tel. (202) 879-3939
Fax: (202) 626-1700
mpapez@jonesday.com
bheifetz@jonesday.com

Respectfully submitted,

/s/ Brian S. Rosen

Martin J. Bienenstock (*pro hac vice*)
Brian S. Rosen (*pro hac vice*)
Jeffrey W. Levitan (*pro hac vice*)
Margaret A. Dale (*pro hac vice*)
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900
mbienenstock@proskauer.com
brosen@proskauer.com
jlevitan@proskauer.com
mdale@proskauer.com

Luis F. del Valle-Emmanuelli
USDC-PR No. 209514
P.O. Box 79897
Carolina, Puerto Rico 00984-9897
Tel. 787.977.1932
Fax. 787.722.1932
dvelawoffices@gmail.com

OF COUNSEL FOR
A&S LEGAL STUDIO, PSC
434 Avenida Hostos
San Juan, PR 00918
Tel: (787) 751-6764/ 763-0565
Fax: (787) 763-8260

*Attorneys for the Financial Oversight and
Management Board for Puerto Rico, as
representative of the Employees Retirement
System of the Government of the
Commonwealth of Puerto Rico*

Counsel for Altair Global Credit Opportunities Fund (A), LLC, Andalusian Global Designated Activity Company, Crown Managed Accounts for and on behalf of Crown/PW SP, Glendon Opportunities Fund, L.P., LMA SPC for and on behalf of Map 98 Segregated Portfolio, Mason Capital Master Fund LP, Oaktree-Forrest Multi-Strategy, LLC (Series B), Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel), L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Oaktree Huntington Investment Fund II, L.P., Oaktree Opportunities Fund X, L.P., Oaktree Opportunities Fund X (Parallel), L.P., Oaktree Opportunities Fund X (Parallel 2), L.P., Oaktree Value Opportunities Fund Holdings, L.P., Oceana Master Fund Ltd., Ocher Rose, L.L.C., Pentwater Merger Arbitrage Master Fund Ltd., PWCM Master Fund Ltd., Redwood Master Fund, Ltd., and SV Credit, L.P.

/s/ Sunni P. Beville

BROWN RUDNICK LLP

Sunni P. Beville, Esq. (Pro Hac Vice)
One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
sbeville@prownrudnick.com

Counsel to the Special Claims Committee

/s/ Kenneth C. Suria

ESTRELLA, LLC
Alberto Estrella (USDC-PR 209804)
Kenneth C. Suria (USDC-PR 213302)
P.O. Box 9023596
San Juan, Puerto Rico 00902-3596
Tel: (787) 977-5050
Fax: (787) 977-5090

Local Counsel to the Special Claims Committee

/s/ Alicia I. Lavernge-Ramírez

José C. Sánchez-Castro
USDC-PR 213312
Alicia I. Lavernge-Ramírez
USDC-PR 215112
SÁNCHEZ/LRV LLC 270 Muñoz Rivera
Avenue, Suite 1110 San Juan, PR 00918
Tel. (787) 522-6776
Fax: (787) 522-6777
jsanchez@sanchezlr.com
alavernge@sanchezlr.com

/s/ Jesse L. Green

Glenn M. Kurtz (*pro hac vice*)
John K. Cunningham (*pro hac vice*)
WHITE & CASE LLP

/s/ Catherine Steege

JENNER & BLOCK LLP
Robert Gordon (admitted pro hac vice)
Richard Levin (admitted pro hac vice)
919 Third Ave
New York, NY 10022-3908
rgordon@jenner.com
rlevin@jenner.com
212-891-1600 (telephone)
212-891-1699 (facsimile)

Catherine Steege (admitted pro hac vice)
Melissa Root (admitted pro hac vice)
Landon Raiford (admitted pro hac vice)
353 N. Clark Street
Chicago, IL 60654
csteeg@jenner.com

1221 Avenue of the Americas
New York, NY 10036
Tel. (212) 819-8200
Fax (212) 354-8113
gkurtz@whitecase.com
jcunningham@whitecase.com

mroot@jenner.com
lraiford@jenner.com
312-222-9350 (telephone)
312-239-5199 (facsimile)

/s/ A.J. Bennazar-Zequeira

Jason N. Zakia (*pro hac vice*)
Cheryl T. Sloane (*pro hac vice*)
Jesse L. Green (*pro hac vice*)
WHITE & CASE LLP
200 S. Biscayne Blvd., Suite 4900
Miami, FL 33131
Tel. (305) 371-2700
Fax (305) 358-5744
jzakia@whitecase.com

BENNAZAR, GARCÍA & MILIÁN, C.S.P
A.J. Bennazar-Zequeira
Héctor M. Mayol Kauffmann
Francisco del Castillo Orozco
Edificio Union Plaza,
1701 Avenida Ponce de León #416
Hato Rey, San Juan
Puerto Rico 00918
ajb@bennazar.org
hector.mayol@bennazar.com
787-754-9191 (telephone)
787-764-3101 (facsimile)

*Counsel for Puerto Rico AAA Portfolio
Bond Fund, Inc.; Puerto Rico AAA
Portfolio Bond Fund II, Inc., Puerto Rico
AAA Portfolio Target Maturity Fund, Inc.;
Puerto Rico Fixed Income Fund, Inc.;
Puerto Rico Fixed Income Fund II, Inc.;
Puerto Rico Fixed Income Fund III, Inc.;
Puerto Rico Fixed Income Fund IV, Inc.;
Puerto Rico Fixed Income Fund V, Inc.;
Puerto Rico Fixed Income Fund VI, Inc.;
Puerto Rico GNMA & U.S. Government
Target Maturity Fund, Inc.; Puerto Rico
Investors Bond Fund I; Puerto Rico
Investors Tax-Free Fund, Inc.; Puerto
Rico Investors Tax-Free Fund II, Inc.;
Puerto Rico Investors Tax-Free Fund III,
Inc.; Puerto Rico Investors Tax-Free Fund
IV, Inc.; Puerto Rico Investors Tax-Free
Fund V, Inc.; Puerto Rico Investors Tax-
Free Fund VI, Inc.; Puerto Rico
Mortgage-Backed & U.S. Government
Securities Fund, Inc.; Tax-Free Puerto
Rico Fund, Inc.; Tax-Free Puerto Rico
Fund II, Inc.; Tax-Free Puerto Rico
Target Maturity Fund, Inc.; and UBS IRA
Select Growth & Income Puerto Rico
Fund*

*Counsel for the Official Committee of Retired
Employees of Puerto Rico*

SEPULVADO, MALDONADO &
COURET

By: /s/ Albéniz Couret-Fuentes
Albéniz Couret-Fuentes
USDC-PR Bar No. 222207
304 Ponce de León Ave. – Suite 990
San Juan, PR 00918
Telephone: (787) 765-5656
Facsimile: (787) 294-0073
Email: acouret@smclawpr.com

REED SMITH LLP
Luke A. Sizemore (*Pro Hac Vice*)
225 Fifth Avenue, Suite 1200
Pittsburgh, PA 15222
Telephone: (412) 288-3131
Facsimile: (412) 288-3063
Email: lsizemore@reedsmith.com

By: /s/ Luke A. Sizemore

*Counsel to The Bank of New York Mellon,
as fiscal agent*

CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

Dated: April 7, 2021

/s/ Bruce Bennett
Bruce Bennett